

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KYANN FLINT,

Plaintiff,

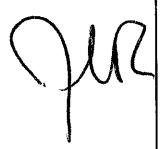
v.

WESTERN WASHINGTON UNIVERSITY  
BOARD OF TRUSTEES,

Defendant.

NO. 2:16-cv-01674-JLR

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME TO  
DISCLOSE EXPERT TESTIMONY  
AND SERVE DISCOVERY**



**STIPULATION**

The parties are presently trying to resolve this matter and prefer to spend their limited resources focused on those efforts at this time. To that end, the parties hereby jointly stipulate to and request the Court to continue the deadline for parties to exchange Expert Testimony by October 27, 2017, and complete Discovery by December 27, 2017, as set forth in the proposed order below.

///

///

///

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME  
TO DISCLOSE EXPERT TESTIMONY AND SERVE DISCOVERY - 1

GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
eighteenth floor  
1191 second avenue  
seattle, washington 98101-2939  
206 464 3939

1 STIPULATED TO this 19<sup>th</sup> day of September, 2017.

2 GARVEY, SCHUBERT & BARER

SCHWARTZ, ROLLER & ZWILLING

3  
4 By s/Seth J. Berntsen  
Seth J. Berntsen, WSBA #30379  
5 Attorneys for Defendant

By s/Edward I. Zwilling, per email authority  
Edward I. Zwilling  
Alabama Bar #ASB-1564-L54-E  
6 Attorneys for Plaintiff

7 SHAW LAW GROUP PLLC

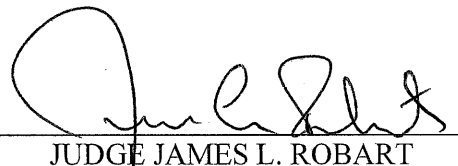
8  
9 By s/Bridget Bourgette Shaw, per email authority  
Bridget Bourgette Shaw, WSBA #28850  
10 Attorneys for Plaintiff

11  
12  
13 **ORDER**

14 THIS MATTER having come on regularly before the undersigned Judge of the above-  
15 entitled Court pursuant to stipulation by the parties hereto through their respective counsels of  
16 record; and the Court being fully advised in the premises, now, therefore,

17 IT IS HEREBY ORDERED, ADJUDGED and DECREED that the parties shall have  
18 until October 27, 2017 to serve Expert Testimony pursuant to FRCP 26(a)(2), and complete  
19 Discovery by December 27, 2017. *The deadline for dispositive motions shall remain on*

20 DONE IN OPEN COURT THIS 19<sup>th</sup> day of September, 2017. *December 26, 2017.*

21  
22   
23 JUDGE JAMES L. ROBART

1 Presented by:

2 GARVEY, SCHUBERT & BARER

3  
4 By s/Seth J. Berntsen  
5 Seth J. Berntsen, WSBA #30379  
Of Attorneys for Plaintiff Foss

6 Approved as to Form; Notice of Presentation Waived:

7 SCHWARTZ, ROLLER & ZWILLING

8  
9 By s/Edward I. Zwilling, per email authority  
Edward I. Zwilling, Alabama Bar #ASB-1564-L54-E  
10 Attorneys for Plaintiff

11 Approved as to Form; Notice of Presentation Waived:

12 SHAW LAW GROUP PLLC

13  
14 By s/Bridget Bourgette Shaw, per email authority  
Bridget Bourgette Shaw, WSBA #28850  
15 Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2017, I electronically filed the foregoing STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO DISCLOSE EXPERT TESTIMONY AND SERVE DISCOVERY with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Edward i. Zwilling  
Schwartz Roller & Zwilling  
600 Vestavia Pkwy, Suite 251  
Birmingham, AL 35007  
205-822-2701  
email: [ezwilling@szalaw.com](mailto:ezwilling@szalaw.com)

Bridget Bourgette Shaw  
Shaw Law Group PLLC  
1818 Westlake Avenue N., Suite 308  
Seattle, WA 98109  
206-623-1225  
email: [bridget@shawlawgrouppllc.com](mailto:bridget@shawlawgrouppllc.com)

Kerena A. Higgins, WSBA #31539  
Attorney Generals Office  
103 E Holly Street, Suite 310  
Bellingham, WA 98225-4728  
Phone: (360) 676-2047  
Email: [kerenah@atg.wa.gov](mailto:kerenah@atg.wa.gov)

SIGNED this 19<sup>th</sup> day of September, 2017 at Seattle, Washington.

/s/ Dominique Barrientes  
Dominique Barrientes, Legal Assistant  
Garvey Schubert Barer  
1191 Second Avenue, Suite 1800  
Seattle, WA 98101-2939  
Phone: (206) 464-3939  
Fax: (206) 464-0125  
[dbarrientes@gsblaw.com](mailto:dbarrientes@gsblaw.com)

GSB:8922571.1

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME  
TO DISCLOSE EXPERT TESTIMONY AND SERVE DISCOVERY - 4

GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
eighteenth floor  
1191 second avenue  
seattle, washington 98101-2939  
206 464 3939